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March 19, 2020

BY ECF

The Honorable Cathy Seibel United States District Judge United States Courthouse 300 Quarropas Street White Plains, New York 10601

Re: *United States v. Matthew Madonna*, S3 17 Cr. 89 (CS)

Dear Judge Seibel:

This letter is submitted on behalf of defendant Matthew Madonna, whom Andrew G. Patel, Esq., and I represent in the above-entitled case, and respectfully requests an adjournment of the sentencing date in this case. Counsel for defendants Steven Crea, Sr., Ted Caldwell, and Christopher Londonio join in this application.

The reasons for the adjournment are obvious and compelling, as alluded to in the Court's Order (ECF # 973) earlier today. Regarding scheduling a new date, setting a firm date is impossible given the uncertainty of the arc of the national, state, and local emergency prompted by the coronavirus pandemic. However, all defense counsel agree that a control date 60 days from now would be useful and appropriate for the purpose of, at that time, determining a specific date for sentencing as early as practicable that would not put the defendants and/or anyone else involved at risk.

Respectfully submitted,

Joshua L. Dratel Andrew G. Patel

Attorneys for Defendant Matthew Madonna

JLD/

Sentencing for Defendants Madonna, Crea Sr., Londonio and Caldwell is adjourned to 6/18/20 at 9:30 am. Updated defense sentencing memos are due 5/18/20. Gov't sentencing memo(s) due 6/1/20. If things have not improved by then and any party thinks another adjournment makes sense, please ask by 6/1/20.

SO ORDERED.

CATHY SEIBEL, U.S.D.J.

3/20/20